

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

NO. 04-10262-DPW

UNITED STATES

VS.

ROBERT D'ANDREA

MOTION TO FURTHER SUSPEND DATE

Now comes the defendant in the above captioned matter and prays this Honorable Court grants him a suspension to his surrender date of October 20, 2006. As reasons for such suspension the defendant states the following.

1. Due to the financial hardship my family is under, my wife Debra just filed Bankruptcy to save our home from foreclosure. Since Debra's release from incarceration in July she has resumed her job at St. Albert the Great. Since the beginning of October Debra has another job that is currently bringing in \$ 1200. per month.
2. I am currently working and have gainfully been employed since my wife's release. I am looking for your consideration to allow me not to be incarcerated for 6 months, and to allow me to work and provide for my family and not leave them in a financial hardship.
3. The situation regarding the death of my beloved mother is still in probate court, against my brother Vincent. I am still waiting for this to be expedited so I can enhance the ability to repay my financial obligation in a timely manner.
4. I (we) have retained an accountant and have complied diligently with the IRS trying to expedite the filings of all required documents.(See attached IRS letter).
5. I have left a message with Assistant District Attorney Michael Pineault on Friday October 13, 2006 to explain these extraordinary circumstances to him.

For these reasons, I ask this Honorable Court to consider my request.